

Exhibit 17

3505-18

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
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6 IN RE: JUUL LABS, INC., MARKETING,
7 SALES PRACTICES, AND PRODUCTS Case No.
LIABILITY LITIGATION 19-MD-02913-WHO

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15 VIDEO-RECORDED DEPOSITION of DONNA BLANCHARD

16 (Via videoconference)

17 Friday, September 3, 2021

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24 REPORTED BY:
25 CYNTHIA MANNING, CSR No. 7645, CLR, CCRR
JOB NO. 199072

1 Q. Fine.

2 And to the best of your knowledge, was
3 there SFUSD TUPE budgeting for any acts
4 specifically done by Altria?

5 A. I don't know.

6 Q. Are you aware of the School District's
7 allegations against Altria in this lawsuit?

8 A. Somewhat.

9 Q. Could you explain what your knowledge
10 is of the allegations against Altria?

11 A. Oh, against Altria, no.

12 Q. Okay. Understood.

13 And are you aware of who Philip Morris
14 is?

15 A. I know the name. It's a brand name.

16 Q. Understood.

17 And are you aware of the School
18 District's allegations against Philip Morris in
19 this lawsuit?

20 A. Not specifics.

21 Q. Can you explain any understanding you
22 do have?

23 A. Just they have joined other school
24 districts in trying to make their case known
25 about ENDS products.

1 Q. Understood.

2 And do you know if it's illegal for
3 people under the age of 21 to purchase nicotine
4 products in California?

5 MR. DOUGLAS: Object to form.

6 THE WITNESS: I'm not sure of the age,
7 no.

8 BY MR. OMOROGIEVA:

9 Q. Okay. And during your time with the
10 School District, are you aware of students
11 receiving e-mails from Altria about JUUL
12 products?

13 A. No.

14 Q. During your time at the School
15 District, are you aware of students receiving
16 any e-mails from Altria?

17 A. No.

18 Q. Are you aware of students in the School
19 District signing up for Altria e-mail lists?

20 A. No.

21 Q. Are you aware of students in your
22 School District signing up for Philip Morris
23 e-mail lists?

24 A. No.

25 Q. During your time with the School

1 District, are you aware of students receiving
2 mailings from Altria about JUUL products?

3 A. No.

4 Q. During your time with the School
5 District, are you aware of students receiving
6 any mailings from Altria?

7 A. No.

8 Q. During your time with the School
9 District, are you aware of students visiting
10 Altria's website?

11 A. Not aware.

12 Q. During your time at the School
13 District, are you aware of students visiting the
14 Philip Morris website?

15 A. Not aware.

16 Q. During your time with the School
17 District, were you aware of students seeing Juul
18 advertisements or marketing on cigarette
19 packages?

20 A. No. A little before my time.

21 Q. And during your time at the School
22 District, were you aware of students purchasing
23 JUUL products from a store that received
24 services from Altria?

25 A. No.

1 Q. Are you aware of anyone in the School
2 District receiving communications directly from
3 Altria?

4 A. No.

5 Q. And have you ever communicated with any
6 employee or agent of Altria?

7 A. No.

8 Q. Are you aware of anyone in the School
9 District receiving communications directly from
10 Philip Morris?

11 A. No.

12 Q. And are you aware of Altria providing
13 any services to retail stores in your School
14 District?

15 A. No.

16 MR. OMOROGIEVA: That's all the
17 questions I have for you, Ms. Blanchard. Thank
18 you.

19 THE WITNESS: Okay. Thank you.

20 MR. DOUGLAS: I have no questions, so I
21 think we're done.

22 THE VIDEOGRAPHER: Off the record then
23 counsel?

24 MR. DOUGLAS: Yes.

25 THE VIDEOGRAPHER: Off the record. The